

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

DETENTION WATCH NETWORK
and CENTER FOR CONSTITUTIONAL
RIGHTS,

Plaintiffs,

v.

UNITED STATES IMMIGRATION
AND CUSTOMS ENFORCEMENT AGENCY,
UNITED STATES DEPARTMENT OF
HOMELAND SECURITY,

Defendants.

-----X

ECF CASE
14-cv-583 (LGS) (RE)

NOTICE OF
MOTION FOR
PRELIMINARY
INJUNCTION

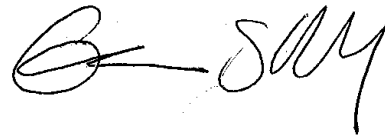
**NOTICE OF PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION
COMPELLING DEFENDANTS TO PRODUCE RECORDS
RESPONSIVE TO PLAINTIFFS' FOIA REQUESTS**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Ghita Schwarz and Supporting Exhibits, the accompanying Memorandum of Law in Support of Plaintiffs' Motion, the Detention Watch Network and the Center for Constitutional Rights (collectively "Plaintiffs"), by their undersigned attorneys will move this Court for an order under the Federal Rule of Civil Procedure 65(a) for a preliminary injunction requiring the United States Immigration and Customs Enforcement agency and the United States Department of Homeland Security ("Defendants") to promptly search for, process and produce records that pertain to policy, practice and communications of the "Detention Bed Quota," or "Detention Bed Mandate," within ten days; and to provide Plaintiffs with declarations, as specified in *Vaughn v. Rosen*, 484 F.2d 820 (D.C. Cir. 1973) within ten days thereafter.

Said motion will be heard by the Honorable Lorna G. Schofield, United States Courthouse, 500 Pearl Street, New York, New York, on a date to be determined by the Court.

Dated: February 11, 2014

Respectfully submitted,

A handwritten signature in black ink, appearing to read "G. Schwarz", written over a horizontal line.

Ghita Schwarz
Sunita Patel
CENTER FOR CONSTITUTIONAL
RIGHTS
666 Broadway, 7th Floor
New York, NY 10012
Tel: (212) 614-6445
Fax: (212) 614-6499
gschwarz@ccrjustice.org
spatel@ccrjustice.org

Attorneys for Plaintiffs